

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

AN ADJUSTMENT OF THE)
RATES OF KENTUCKY-) CASE NO. 2007-00143
AMERICAN WATER COMPANY)

MOTION FOR FULL INTERVENTION

Come now the Community Action Council for Lexington-Fayette, Bourbon, Harrison and Nicholas Counties, Inc. (CAC), P.O. Box 11610, Lexington, KY 40576, by counsel, pursuant to 807 KAR 5:001 Section 3(8), and hereby move for leave to intervene as a full party in the above-referenced proceeding. In support of this motion, CAC states as follows:

1. CAC is a non-profit, 501(c)(3), community action agency which provides social services, including energy assistance and related services, to numerous low income residents of Kentucky-American Water Company's service territory. As such, it is likely to present issues and provide a perspective which is not likely to be presented by the other parties to this proceeding, and its interests are not adequately represented by other parties to this proceeding. CAC's participation will not unduly delay these proceedings.
2. In this proceeding, the Commission will examine the request by Kentucky-American Water Company for an adjustment to its rates, which if approved as requested could have a significant impact on the low-income clients served by

CAC.

3. CAC expects to present testimony from Jack E. Burch, Executive Director
Additionally, CAC may choose to present testimony from other witnesses not yet identified.
4. The intervention of CAC into this action is likely to present issues and facts that will not be adequately addressed or represented by any other party and will be helpful to the Commission in fully considering the matters without unduly complicating or disrupting this proceeding.
5. CAC respectfully requests that it be granted leave for full intervention and to participate fully as a party in this proceeding, including the right to present testimony and exhibits, present witnesses, cross examine

/s/ Joe F. Childers
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**ATTORNEY FOR COMMUNITY
ACTION COUNCIL FOR
LEXINGTON-FAYETTE, BOURBON,
HARRISON AND NICHOLAS
COUNTIES, INC.**

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing document, in paper medium, has been served on the following persons by United States mail, and I further certify that a) the electronic version of the filing is a true and accurate copy of the document filed in paper medium, b) the electronic version of the filing has been transmitted to the Commission, c) the Commission and

other parties participating in this case by electronic means have been notified by electronic mail that the electronic version of the filing has been transmitted to the Commission:

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on this the 15th day of May, 2007.

/s/ Joe F. Childers
JOE F. CHILDERS